

**UNITED STATES DISTRICT COURT**

EASTERN DISTRICT OF ARKANSAS  
RICHARD SHEPPARD ARNOLD UNITED STATES COURTHOUSE  
600 W. CAPITOL, ROOM 423  
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**July 29, 2006**

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Re: *Reeves v. Wyeth*, 4:05-CV-00163 -- Wyeth's Goodness

Dear Counsel:

The two things listed in next to last paragraph of Ms. Duggan's letter of July 26, 2006,<sup>1</sup> will be considered if we reach the punitive damage issue -- not now.

It seems to me that Wyeth should be able to present evidence as to how long it has been in business, how many employees it has, and generally "what it does for a living."

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<sup>1</sup>Doc. No. 286.

On the other hand it seems to me that items such as the ones mentioned in points “III”, “IV”, and “V” would open the door for many of the things set forth in Ms. Littlepage’s response letter of July 26, 2006.<sup>2</sup>

It seems to me that the “time line for development and approval of prescription drugs” would be appropriate.

“The promising types of drugs that Wyeth currently has in the development pipeline” would seem to open the door too.

In fine, unless, Wyeth wants to risk opening doors, I think it should be very conservative in presenting an overview of Wyeth. And this approach will help insure that we confine the trial to the specific issues presented by the pleadings in this case.

Cordially,

/s/ Wm. R. Wilson, Jr. \_\_\_\_\_

Original to the Clerk of the Court

cc: The Honorable Henry L. Jones, Jr.  
Other Counsel of Record

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<sup>2</sup>Doc. No. 288.